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August 26, 2021

By E-Mail

The Honorable Kevin N. Fox
United States Magistrate Judge
Southern District of New York
40 Foley Square
New York, NY 10007

MEMORANDUM ENDORSEMENT

Re: *United States v. Seth Andrew*, 21 Mag. 4262

Dear Judge Fox:

We represent Mr. Seth Andrew in the above-captioned case. As set forth below, we write to respectfully request that the Court: (i) grant permission for Mr. Andrew to travel outside of his district of residence from August 26, 2021 to August 28, 2021; and (ii) modify the bail conditions imposed by the Court on April 27, 2021, May 19, 2021, and July 8, 2021. *See* ECF Nos. 4, 6, 13. The government and Pretrial Services do not oppose these requests.

Under the terms of his release, Mr. Andrew must remain within the District of Rhode Island, where he currently resides, except for attorney visits and court appearances. He is also permitted to travel to Massachusetts, Connecticut, and New York for periodic day trips, provided that he receives prior approval from his Pretrial Services Officer.

We respectfully request that Mr. Andrew be permitted to travel by car to the District of Columbia from August 26 to 28 to retrieve some personal items from his property located there and return them to his home in Rhode Island. Mr. Andrew intends to drive through Connecticut, New York, New Jersey, Pennsylvania, Delaware, and Maryland on his way to and from the District of Columbia.

In addition, we respectfully request that the Court modify Mr. Andrew's conditions of release to permit him to travel to the District of Columbia as well as Massachusetts, where close family members reside, for periodic overnight trips, provided that he receive prior approval from his Pretrial Services Officer.

August 26, 2021
Page 2 of 2

We thank the Court for its consideration of these requests.

Respectfully submitted,
KRIEGER KIM & LEWIN LLP

By: 

Edward Y. Kim
Varun A. Gumaste

cc: AUSA Ryan B. Finkel
Pretrial Services Officer Dominique Jackson (SDNY)
Pretrial Services Officer Tim Donohue (DRI)

8/26/21

Application granted.

SO ORDERED:

Kevin Nathaniel Fox

HON. KEVIN NATHANIEL FOX
United States Magistrate Judge
Southern District of New York